

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

| | | |
|---------------------------------|---|----------------|
| ASHRAF SALEH, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| JPMORGAN CHASE BANK, N.A., |) | CASE NO. _____ |
| EQUIFAX INFORMATION SERVICES, |) | |
| LLC, EXPERIAN INFORMATION |) | |
| SOLUTIONS, INC. and TRANS UNION |) | |
| LLC, |) | |
| |) | |
| Defendants. |) | |

DEFENDANT TRANS UNION LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, Defendant Trans Union, LLC (“TransUnion”) hereby files this Notice of Removal of the above-captioned action to this Court on the following grounds:

1. TransUnion is a named Defendant in Index No. 510089/2025 filed by Plaintiff Ashraf Saleh (“Plaintiff”) in the Supreme Court of the State of New York, County of Kings (the “State Court Action”).
2. The Summons with Notice in the State Court Action was filed with the Clerk of the Supreme Court of the State of New York, County of Kings on March 26, 2025.
3. This Notice is being filed with this Court within thirty (30) days after TransUnion received a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action is based.
4. This Court is the proper district court for removal because the State Court Action is pending within this district.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon TransUnion in the State Court Action is attached hereto as **Exhibit A**.

6. Certain of the claims for relief against Defendants alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

7. Pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over Plaintiff's other claims for relief arising under the New York Fair Credit Reporting Act, N.Y. GEN. BUS. LAW § 380 *et seq.* ("NY FCRA"), as these claims arise from the same operative facts and form part of the same case or controversy.

8. As of the date of this Notice, all named Defendants consent to removing the above-captioned action to this Court. Equifax Information Services, LLC, JPMorgan Chase Bank N.A. and Experian's consents to removal are attached hereto as **Exhibit B, Exhibit C and Exhibit D**, respectively.

9. Promptly after the filing of this Notice of Removal, TransUnion shall provide notice of the removal to Plaintiff through his attorney of record in the State Court Action, and

shall file a copy of this Notice with the clerk of the court in the State Court Action, as required by 28 U.S.C. § 1446(d). *See* **Exhibit E**.

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Andrew Hope

Andrew G. Hope (NY Bar ID 4913547)

Two Liberty Place

50 S. 16th Street, Suite 3200

Philadelphia, PA 19102

T: 215-665-8700

andrew.hope@bipc.com

Dated: April 25, 2025

Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

I, Andrew G. Hope, hereby certify that on April 25, 2025, the foregoing document has been electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Andrew Hope
Andrew G. Hope (NY Bar ID 4913547)
Two Liberty Place
50 S. 16th Street, Suite 3200
Philadelphia, PA 19102
T: 215-665-8700
andrew.hope@bipc.com
Counsel for Defendant Trans Union, LLC

Dated: April 25, 2025

